

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Estate  
of Bernard L. Madoff,

Plaintiff,

v.

STANLEY SHAPIRO, *et al.*,

Defendants.

Adv. Pro. No. 10-05383 (SMB)

**DECLARATION OF TORELLO H. CALVANI IN SUPPORT OF  
THE TRUSTEE'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS**

I, Torello H. Calvani, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly admitted to practice law in the State of New York. I am a attorney with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the

estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701 *et seq.* I respectfully submit this Declaration in Support of the Trustee's Motion to Compel the Production of Documents in the above-captioned proceeding. I have personal knowledge of the facts set forth herein.

2. Attached as Exhibit 1 to this Declaration is a true and correct copy of Defendant Stanley Shapiro's Responses and Objections to the Trustee's First Set of Requests for the Production of Documents.

3. Attached as Exhibit 2 to this Declaration is a true and correct copy of Defendant David Shapiro's Responses and Objections to the Trustee's First Set of Requests for the Production of Documents.

4. Attached as Exhibit 3 to this Declaration is a true and correct copy of Defendants Kenneth Citron's and Leslie Shapiro Citron's Responses and Objections to the Trustee's First Set of Requests for the Production of Documents.

5. Attached as Exhibit 4 to this Declaration is a true and correct copy of the Trustee's June 7, 2017 letter to Defendants regarding the outstanding document requests.

6. Attached as Exhibit 5 to this Declaration is a true and correct copy of the October 1, 2017 letter from Defendant Stanley Shapiro's attorney to counsel for the Trustee regarding outstanding document requests.

I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York on April 5, 2018.



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Torello H. Calvani